



August 26, 2003

Air Docket,
Environmental Protection Agency,
Mailcode: 6102T,
1200 Pennsylvania Ave., NW.,
Washington, DC, 20460,
Attention Docket ID No. OAR-2003-0046.

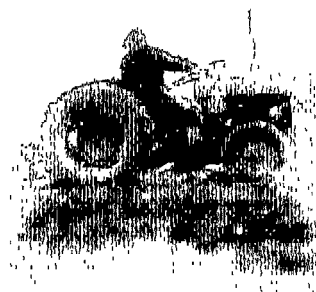
Sent Via Facsimile. (202) 566-1741

Re: "LATE COMMENTS" on Docket ID. No. OAR-2003-0046

To Whom It May Concern:

On behalf of the Fresno County Farm Bureau (FCFB) and our 6000 members, we support EPA's proposal to revise the definition of non-road engines to include all diesel-powered engines used in agricultural operations in the State of California that are certified by the engine maker to meet the applicable non-road emission standards. It is our understanding that under this proposed rule, such engines would be considered non-road engines without regard to whether these engines are portable or transportable or how long these engines remain in one fixed location at a farm.

As you know, nearly two million people farm or ranch in the United States and nearly 90 percent of U.S. farms are operated by individuals or family corporations and more than 15 percent of the U.S. population is employed in farm or farm-related jobs, including production agriculture, farm inputs, processing and marketing, and wholesale and retail sales. This is a very valid and necessary rule, the agricultural industry in the State of California has done much to reduce the emission from diesel powered irrigation engines and the agricultural community in the San Joaquin Valley has replaced or retrofitted over 2,300 irrigation pump engines, thereby reducing NOx emissions by over 2,500 tons per year. Under the USDA/NRCS Environmental Quality Incentives Program (EQIP) is currently going to replace 273 engines in their voluntary program. The imposition of New and Modified Source Review with the potential for offsets and public noticing and administrative processing timelines on irrigation engines would have significant negative



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impact on crop production. Irrigation internal engine pumps operate on the farm in the same manner as tractors and implements, i.e. timely application of absolutely necessary agronomic practices. In this case the application of water is an absolute necessity for the growing of crops, past experience dictates that the federal bureaucracy not necessarily understands that a 24 hour delay in irrigation could cause the loss of a crop and that farmer will unable to pass their costs on to the customers.

In our opinion, imposing a time consuming and burdensome regulatory program on production agriculture was not the intention of Congress. We do not believe that it was the intent of our congressional representatives to impose a permit issuance and public comment time line on farm production. For instance, if an engine needs to be replaced the crop cannot wait 45 days for public comment, or wait months for offsets to be provided, or to subject farmers to criminal prosecution for replacing or repairing an irrigation pump when his entire livelihood is dependent on watering his crop.

The function and importance of an IC irrigation engine is the same as a tractor, or harvester, or cultivator in agronomic practices. Its function is even more critical in that the crop cannot survive without water.

Again, FCFB supports EPA's proposal regarding the definition for irrigation IC engines to be nonroad engines suitable for regulation under title II of the Federal Clean Air Act.

Thank you,

A handwritten signature in black ink, appearing to read "Karla Kay Fullerton", with a stylized flourish at the end.

Karla Kay Fullerton
Executive Director